

AMENDED IN ASSEMBLY APRIL 20, 2005

CALIFORNIA LEGISLATURE—2005–06 REGULAR SESSION

ASSEMBLY BILL

No. 503

Introduced by Assembly Member Lieber

February 16, 2005

An act to ~~add Section 11216 to~~ amend Sections 10500, 11004, and 11454.5 of, and to add Sections 11211.5, 11216, and 11217 to, the Welfare and Institutions Code, relating to CalWORKs, and making an appropriation therefor.

LEGISLATIVE COUNSEL'S DIGEST

AB 503, as amended, Lieber. CalWORKs: bill of rights.

Existing law provides, in the administration of aid under any public assistance program, that duties be performed to secure for every person the amount of aid to which he or she is entitled without attempting to solicit unnecessary information or comment or criticize on unrelated matters.

This bill would require that the duties be performed to secure for every person the maximum amount of aid and services to which he or she is entitled as provided under these provisions.

Existing law provides that current and future grants payable to an assistance unit under public social services programs may be reduced because of prior overpayments.

This bill would establish circumstances under which an overpayment would not be determined if the agency responsible for calculating the grant did not correctly calculate that grant.

Existing law provides for the California Work Opportunity and Responsibility to Kids (CalWORKs) program and other social services programs, under which each county provides cash assistance and other benefits to qualified low-income families and individuals.

This bill would require that each CalWORKs recipient of aid be provided with the name and telephone number of his or her caseworker and that caseworker's supervisor, and be assigned a new caseworker within 30 days of a request for a new caseworker if 2 conditions are met.

This bill would require the State Department of Social Services to prepare a bill of rights that includes specified rights and to ensure that each county provides each CalWORKs recipient a copy of that bill of rights in his or her native language, on or before April 1, 2006, to convene a meeting of stakeholders to advise the department on developing a welfare bill of rights pamphlet that meets criteria established under the bill. The bill would require, once the pamphlet is developed and approved by the department, that it be provided and explained orally in the individual's primary language, to the recipient at each aid eligibility determination and redetermination.

To the extent this bill would increase the responsibilities of counties in the administration of the CalWORKs program, this bill would impose a state-mandated local program.

Existing law provides that a parent or caretaker is eligible for aid under the CalWORKs program for a cumulative total of 60 months. Under existing law, any month in which certain conditions exist is not counted as a month of receipt of aid for this purpose.

This bill would add 4 circumstances to the list of conditions that may exist in a month that would make that month of receipt of aid not count toward the cumulative 60 month maximum aid eligibility.

This bill would require the department, in consultation with stakeholders, to produce a comprehensive written feasibility study analyzing the adoption of a statewide policy in California to assist CalWORKs' recipients in achieving self-sufficiency by excluding months from being counted toward a recipient's 60-month time limit when the individual receiving CalWORKs' cash aid is engaging in employment or education in compliance with the welfare-to-work hours requirements.

Because state funds are continuously appropriated to pay a share of the cost of CalWORKs benefits and because this bill expands CalWORKs eligibility, the bill would constitute an appropriation.

To the extent this bill would increase the responsibilities of counties in the administration, and expand eligibility for, the CalWORKs program, this bill would impose a state-mandated local program.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that, if the Commission on State Mandates determines that the bill contains costs mandated by the state, reimbursement for those costs shall be made pursuant to these statutory provisions.

Vote: ~~majority~~^{2/3}. Appropriation: ~~no~~^{yes}. Fiscal committee: yes. State-mandated local program: yes.

The people of the State of California do enact as follows:

1 ~~SECTION 1. Section 11216 is added to the Welfare and~~
2 ~~Institutions Code, to read:~~
3 ~~SECTION 1. (a) The Legislature finds and declares all of the~~
4 ~~following:~~
5 ~~(1) At the end of 2004, the adults in more than 102,500~~
6 ~~California families had become ineligible for benefits because~~
7 ~~they had used up the full-lifetime limit of 60-months of~~
8 ~~CalWORKs cash aid.~~
9 ~~(2) Nearly one-half of all adults on CalWORKs earned income~~
10 ~~through employment, yet continue to remain eligible for aid~~
11 ~~because their earned income is not enough to allow the families~~
12 ~~to become self-sufficient.~~
13 ~~(3) In 2000, 32 percent of the single parent adults working~~
14 ~~while on CalWORKs were working 32 or more hours of~~
15 ~~unsubsidized employment, 12 percent of whom were working~~
16 ~~full-time (40 hours per week), and thus were meeting the full~~
17 ~~welfare-to-work requirement through unsubsidized employment.~~
18 ~~Over 80 percent of adults who are meeting the CalWORKs~~
19 ~~welfare-to-work requirements satisfy the requirement primarily~~
20 ~~through unsubsidized employment.~~
21 ~~(4) Many parents working while on CalWORKs continue to~~
22 ~~receive very small amounts of aid because their earnings are~~
23 ~~low, causing them to use up their five-year lifetime limit on aid.~~
24 ~~During this time, the adults have limited access to education and~~
25 ~~training to achieve self-sufficiency.~~

1 (5) Over 70 percent of employed CalWORKs participants are
2 working in the services and retail industries, which provide little
3 chance for earning self-sufficient wages.

4 (6) Providing better access for adults to participate in
5 education and training would help more families reach
6 self-sufficiency. Research indicates that postsecondary education
7 and training, including career technical, vocational English as a
8 second-language (VESL), and adult basic education, are the
9 most reliable routes to self-sufficiency for underserved
10 populations, in particular low-income parents and foster youth.

11 (7) Further, postsecondary education and job training lead to
12 higher earnings in the long run and greater success in the labor
13 market, particularly for low-income adults with children. Studies
14 show that low-income adults with children and without a high
15 school diploma can increase their future earnings by 94 percent
16 if they enroll in a California community college and complete an
17 associate degree.

18 (8) Time limits can act as an impediment to reaching the goal
19 of self-sufficiency by encouraging CalWORKs' recipients to
20 accept a job that will not lead to self-sufficiency instead of
21 completing education or job training in order to move into a job
22 that would provide enough income to exit CalWORKs cash aid
23 and become self-sufficient.

24 (9) States have the flexibility under the Temporary Assistance
25 for Needy Families (TANF) program to encourage work and
26 education by not counting the months on aid in which an
27 individual is working or participating in education or training.
28 To take advantage of this flexibility and to remove disincentives
29 from participating in work and education that will lead to
30 self-sufficiency, California should study how to implement such a
31 policy.

32 (10) In 2003-04, an average of nearly 80,000 individuals
33 receiving CalWORKs were sanctioned or noncompliant and an
34 average of 35,000 individuals receiving CalWORKs are
35 investigated for fraud. These numbers suggest that individuals do
36 not have adequate information on how to comply with the
37 program. A readable and accessible pamphlet of an individual's
38 rights and responsibilities would aid in educating individuals
39 receiving CalWORKs on how to comply with the program and

1 *provide them with information on how to receive the needed*
2 *services to ensure that they can comply.*

3 *(11) Individuals receiving CalWORKs also would be more*
4 *likely to comply if they receive the maximum aid and services to*
5 *which they are entitled.*

6 *(b) It is therefore the intent of the Legislature in enacting this*
7 *act to accomplish all of the following:*

8 *(1) Conduct a study on the feasibility of implementing a policy*
9 *in California to exclude months on aid from the 60-month time*
10 *limit for months in which an individual is fully meeting the*
11 *welfare-to-work requirements through work, education, or*
12 *training.*

13 *(2) Develop a welfare bill of rights pamphlet to inform*
14 *individuals receiving CalWORKs about their rights and*
15 *responsibilities under the CalWORKs program, in readable and*
16 *accessible language, to be provided upon determination and*
17 *redetermination of aid.*

18 *(3) Use the welfare bill of rights pamphlet to educate*
19 *individuals receiving CalWORKs in order to protect them from*
20 *being sanctioned because they do not understand CalWORKs*
21 *program requirements or because they did not receive*
22 *information about or receive the services needed to achieve*
23 *self-sufficiency.*

24 *(4) Ensure that individuals receiving CalWORKs are provided*
25 *the maximum aid and services to which they are entitled under*
26 *CalWORKs.*

27 *(5) Ensure that individuals receiving CalWORKs are provided*
28 *information on how to access social service personnel to help*
29 *them to comply with CalWORKs program requirements.*

30 *(6) Protect individuals receiving CalWORKs from being*
31 *punished under some circumstances in which they receive*
32 *overpayments made as a result of agency error.*

33 *(7) Ensure that individuals who are not provided the needed*
34 *services under CalWORKs do not have those months in which*
35 *they are not provided services count towards their 60-month time*
36 *limit.*

37 *SEC. 2. Section 10500 of the Welfare and Institutions Code is*
38 *amended to read:*

39 *10500. Every person administering aid under any public*
40 *assistance program shall conduct himself or herself with*

1 courtesy, consideration, and respect toward applicants for the
2 recipients of aid under that program, and shall endeavor at all
3 times to perform his *or her* duties in such manner as to secure for
4 every person the *maximum* amount of aid *and services* to which
5 he *or she* is entitled, without attempting to elicit any information
6 not necessary to carry out the provisions of law applicable to the
7 program, and without comment or criticism of any fact
8 concerning applicants or recipients not directly related to the
9 administration of the program.

10 *SEC. 3. Section 11004 of the Welfare and Institutions Code is*
11 *amended to read:*

12 11004. (a) The provisions of this code relative to public
13 social services for which state grants-in-aid are made to the
14 counties shall be administered fairly to the end that all persons
15 who are eligible and apply for ~~such~~ *those* public social services
16 shall receive the assistance to which they are entitled promptly,
17 with due consideration for the needs of applicants and the
18 safeguarding of public funds.

19 ~~(a)~~

20 (b) Any applicant for, or recipient or payee of, ~~such~~ public
21 social services *under this code* shall be informed as to the
22 provisions of eligibility and his or her responsibility for reporting
23 facts material to a correct determination of eligibility and grant.

24 ~~(b)~~

25 (c) Any applicant for, or recipient or payee of, ~~such~~ public
26 social services *under this code* shall be responsible for reporting
27 accurately and completely within his or her competence those
28 facts required of him or her pursuant to subdivision ~~(a)~~ (b) and to
29 report promptly any changes in those facts.

30 ~~(c)~~

31 (d) Current and future grants payable to an assistance unit may
32 be reduced because of prior overpayments. *In calculating an*
33 *overpayment, no overpayment shall be determined if the agency*
34 *did not correctly calculate the grant and the recipient has made*
35 *full, complete, and timely disclosure of the facts required of him*
36 *or her by the agency pursuant to subdivision (b), unless the*
37 *recipient received more aid than the maximum aid payment*
38 *allowed for the assistance unit of the correct size.* In cases where
39 the overpayment was caused by agency error, grant payments
40 shall be reduced by 5 percent of the maximum aid payment of the

1 assistance unit. Grant payments to be adjusted because of prior
2 overpayments because of any other reason shall be reduced by 10
3 percent of the maximum aid payments for the assistance unit. A
4 recipient may have an overpayment adjustment in excess of the
5 amounts allowable under this section if the recipient requests it.

6 ~~(d)~~

7 (e) No determination of ineligibility shall be made
8 retrospectively so as to result in an assessment of an
9 overpayment in circumstances where there is a failure on the part
10 of an applicant or recipient to perform an act constituting a
11 condition of eligibility, if the failure is caused by an error made
12 by a state agency or a county welfare department, and if the
13 amount of the grant received by the applicant or recipient would
14 not have been different had the act been performed.

15 ~~(e)~~

16 (f) Prior to effectuating any reduction of current grants to
17 recover past overpayments, the recipient shall be advised of the
18 proposed reduction and of his or her entitlement to a hearing on
19 the propriety of the reduction.

20 ~~(f)~~

21 (g) If the department determines after a hearing that an
22 overpayment has occurred, the county providing the public social
23 services shall seek to recover in accordance with subdivision ~~(e)~~
24 (d) the full amount of the overpayment to the assistance unit,
25 including any amount paid while the hearing process was
26 pending. ~~Such~~ This adjustment shall be permitted concurrently
27 with any suit for restitution, and recovery of overpayment by
28 adjustment shall reduce by the amount of ~~such~~ that recovery to
29 the extent of liability for restitution.

30 ~~(g)~~

31 (h) If the individual is no longer receiving aid under Chapter 2
32 (commencing with Section 11200) recovery of overpayments
33 received under that chapter shall not be attempted where the
34 outstanding overpayments are less than thirty-five dollars (\$35).
35 Where the overpayment amounts owed are thirty-five dollars
36 (\$35) or more, reasonable cost-effective efforts at collection shall
37 be implemented. Reasonable efforts shall include notification of
38 the amount of the overpayment and that repayment is required.
39 The department shall define reasonable cost-effective collection

1 methods. In cases involving fraud, every effort shall be made to
2 collect the overpayments regardless of the amount.

3 ~~(h)~~

4 (i) If the individual responsible for the overpayment to the
5 assistance unit is no longer eligible for public social services or if
6 he or she becomes a member of another assistance unit,
7 recoupment of overpayments shall be made against the individual
8 or his or her present assistance unit, or both.

9 ~~(i)~~

10 (j) Where an overpayment has been made to an assistance unit
11 which is no longer receiving public social services, recovery
12 shall be made by appropriate action under state law against the
13 income or resources of the individual responsible for the
14 overpayment or against the family.

15 ~~(j)~~

16 (k) No civil or criminal action may be commenced against any
17 person based on alleged unlawful application for or receipt of
18 public social services, where the case record of ~~such~~ that person
19 has been destroyed after the expiration of the four-year retention
20 period pursuant to Section 10851.

21 ~~(k)~~

22 (l) (1) When an underpayment or denial of public social
23 service occurs and as a result the applicant or recipient does not
24 receive the amount to which he or she is entitled, the county shall
25 provide public social services equal to the full amount of the
26 underpayment unless prohibited by federal law. In cases that
27 have both an underpayment and an overpayment, the
28 underpayment shall be offset against the overpayment prior to
29 correcting any remaining underpayment.

30 ~~Any~~

31 (2) Any corrective payments made pursuant to this subdivision
32 shall be disregarded in determining the income of the family and
33 shall be disregarded in determining the resources of the family in
34 the month the corrective payment is made and in the following
35 month.

36 ~~(l)~~

37 (m) This subdivision shall be applicable only to applicants,
38 recipients and payees under Chapter 2 (commencing with Section
39 11200) of Part 3 of Division 9. Any suits to recover
40 overpayments described in subdivision (f) shall be brought on

1 behalf of the county by the county counsel unless the board of
2 supervisors delegates such duty to the district attorney by
3 ordinance or resolution.

4 *SEC. 4. Section 11211.5 is added to the Welfare and*
5 *Institutions Code, to read:*

6 *11211.5. (a) The department, in consultation with*
7 *stakeholders, shall produce a comprehensive written feasibility*
8 *study analyzing the adoption of a statewide policy in California*
9 *to assist CalWORKs' recipients in achieving self-sufficiency by*
10 *excluding months from being counted toward a recipient's*
11 *60-month time limit when the individual receiving CalWORKs'*
12 *cash aid is engaging in employment or education in compliance*
13 *with the welfare-to-work hours requirements under Section*
14 *11322.8.*

15 *(b) The department shall do all of the following in the study:*

16 *(1) Estimate how many individuals in California would benefit*
17 *from implementing the policy, including the total number of*
18 *recipients meeting the full welfare-to-work hours requirements*
19 *under Section 11322.8 through any of the following:*

20 *(A) Through a combination of any of the work and education*
21 *activities allowed under Section 11322.6.*

22 *(B) Solely through participation in unsubsidized work under*
23 *subdivision (a) of Section 11322.6.*

24 *(C) Through participation in any of the work activities*
25 *allowed under Section 11322.6.*

26 *(D) Through participation in any of the education activities*
27 *allowed under Section 11322.6.*

28 *(2) Calculate the cost of allowing adult recipients, under each*
29 *of the categories specified in paragraph (1), to continue to*
30 *receive CalWORKs cash assistance based on the average*
31 *number of months, beyond 60 months, that individuals who are*
32 *meeting the full welfare-to-work requirements through education*
33 *or employment, must remain on CalWORKs cash aid because*
34 *they have not received the education, employment, or training*
35 *that would allow them to be self-sufficient from CalWORKs cash*
36 *aid.*

37 *(3) Review existing research or studies assessing time limit*
38 *relief provided in other states, such as Illinois, Maryland, Rhode*
39 *Island, Delaware, and Pennsylvania, including costs and benefits*
40 *of time limit relief policies where available.*

1 (c) Stakeholders shall include, at a minimum, proportional
2 representation from each of the following organizations:

3 (1) The County Welfare Director's Association (CWDA).

4 (2) Organizations of CalWORKs' parents, including, but not
5 limited to, Low-Income Families' Empowerment Through
6 Education (LIFETIME).

7 (3) Other community and legal aid organizations advocating
8 on behalf of CalWORKs recipients.

9 (4) Representatives of community colleges and other
10 institutions of higher education.

11 (d) After receiving and incorporating written and oral
12 feedback from the stakeholders selected pursuant to subdivision
13 (c), the department shall do both of the following:

14 (1) Develop recommendations on both of the following:

15 (A) How the Legislature may exclude months from being
16 counted toward a CalWORKs recipient's 60-month time limit
17 when the individual receiving cash aid is engaging in
18 employment or education.

19 (B) How to improve access to CalWORKs education, training,
20 and employment opportunities to help individuals become
21 self-sufficient from CalWORKs cash aid.

22 (2) Report its findings and recommendations to the
23 appropriate fiscal and policy committees of the Legislature on or
24 before April 1, 2006.

25 SEC. 5. Section 11216 is added to the Welfare and
26 Institutions Code, to read:

27 11216. (a) On or before April 1, 2006, the department shall
28 convene a meeting of stakeholders, including Low-Income
29 Families' Empowerment Through Education (LIFETIME) and
30 other community and legal aid organizations advocating on
31 behalf of welfare recipients, to advise the department on
32 developing a welfare bill of rights pamphlet.

33 (b) The pamphlet shall comply with all of the following
34 requirements:

35 (1) Contain key existing rights and responsibilities of welfare
36 recipients under state and federal law.

37 (2) Contain information regarding CalWORKs programs and
38 services.

39 (3) Be written in a manner and form that is understandable,
40 easily accessible, and at a reading level consistent with the latest

1 *statistical information publicly available stating the average*
2 *education level of CalWORKs' recipients.*

3 *(4) Be developed, in consultation with the stakeholders*
4 *described in subdivision (a), within six months of the convening*
5 *of the first stakeholders meeting.*

6 *(c) Once the welfare bill of rights pamphlet is developed and*
7 *adopted by the department, each county shall provide, and the*
8 *rights within shall be explained orally, in the individual's*
9 *primary language, to the recipient at the time a recipient's*
10 *eligibility for aid is determined and at each subsequent*
11 *redetermination.*

12 *SEC. 6. Section 11217 is added to the Welfare and*
13 *Institutions Code, to read:*

14 *11217. (a) Each recipient of aid shall be provided with the*
15 *name and telephone number of his or her caseworker and that*
16 *caseworker's supervisor.*

17 *(b) Each recipient of aid shall be assigned a new caseworker*
18 *within 30 days of the request for a new caseworker if the*
19 *recipient has good cause for making the request and a request to*
20 *change caseworker has not occurred within the previous 12*
21 *months.*

22 *SEC. 7. Section 11454.5 of the Welfare and Institutions Code*
23 *is amended to read:*

24 *11454.5. (a) Any month in which the following conditions*
25 *exist shall not be counted as a month of receipt of aid for the*
26 *purposes of subdivision (a) of Section 11454:*

27 *(1) The recipient is exempt from participation under Article*
28 *3.2 (commencing with Section 11320) due to disability, or*
29 *advanced age in accordance with paragraph (3) of subdivision (b)*
30 *of Section 11320.3, or due to caretaking responsibilities that*
31 *impair the recipient's ability to be regularly employed, in*
32 *accordance with paragraph (4) or (5) of subdivision (b) of*
33 *Section 11320.3.*

34 *(2) The recipient is eligible for, participating in, or exempt*
35 *from, the Cal-Learn Program provided for pursuant to Article 3.5*
36 *(commencing with Section 11331) or is participating in another*
37 *teen parent program approved by the department.*

38 *(3) The cost of the cash aid provided to the recipient for the*
39 *month is fully reimbursed by child support, whether collected in*
40 *that month or any subsequent month.*

1 (4) The family is a former recipient of cash aid under this
2 chapter and currently receives only child care, case management,
3 or supportive services pursuant to Section 11323.2 or Article
4 15.5 (commencing with Section 8350) of Chapter 2 of Part 6 of
5 the Education Code.

6 (5) To the extent provided by federal law, the recipient lived in
7 Indian country, as defined by federal law, or an Alaskan native
8 village in which at least 50 percent of the adults living in the
9 Indian country or in the village are not employed.

10 (6) *The recipient has not received the welfare-to-work support*
11 *services needed to participate in an approved welfare-to-work*
12 *activity, such as child care, transportation, ancillary costs, or*
13 *personal counseling, as required under Section 11323.2.*

14 (7) *The recipient did not receive materials or information in*
15 *his or her native language as required by law.*

16 (8) *The recipient did not receive an accommodation for his or*
17 *her mental or physical disability as required under this section*
18 *or the federal Americans with Disabilities Act of 1990.*

19 (9) *The recipient failed to receive the cash aid to which he or*
20 *she was entitled for that month.*

21 (b) In cases where a lump-sum diversion payment is provided
22 in lieu of cash aid under Section 11266.5, the month in which the
23 payment is made or the months calculated pursuant to
24 subdivision (f) of Section 11266.5 shall count against the limits
25 specified in Section 11454.

26 *SEC. 8. If the Commission on State Mandates determines that*
27 *this act contains costs mandated by the state, reimbursement to*
28 *local agencies and school districts for those costs shall be made*
29 *pursuant to Part 7 (commencing with Section 17500) of Division*
30 *4 of Title 2 of the Government Code.*

31 ~~11216. (a) The department shall prepare a bill of rights that~~
32 ~~includes all of the rights described in subdivision (b) and shall~~
33 ~~ensure that each county shall provide to each applicant and~~
34 ~~recipient under this chapter a copy of that bill of rights in the~~
35 ~~native language of the applicant or recipient.~~

36 ~~(b) The bill of rights prepared under this section shall include,~~
37 ~~but need not be limited to, the right to all of the following:~~

38 ~~(1) Courteous, respectful, and fair treatment.~~

1 ~~(2) Professional and competent services provided by~~
2 ~~department and county welfare workers that will allow the~~
3 ~~recipient to meet his or her personal and family goals.~~

4 ~~(3) Receive all information in the native language of the~~
5 ~~recipient and translation services made available as needed.~~

6 ~~(4) Reasonable accommodations for disabilities.~~

7 ~~(5) Receive cash grants in a timely manner.~~

8 ~~(6) To apply for transportation benefits for welfare-to-work~~
9 ~~activities.~~

10 ~~(7) To apply for an exemption from welfare-to-work activities~~
11 ~~and time limits if the recipient has a disability or is caring for a~~
12 ~~disabled relative.~~

13 ~~(8) To apply for child care assistance.~~

14 ~~(9) To be exempt from time limits if unable to work as a result~~
15 ~~of domestic violence and its effects.~~

16 ~~(10) To have education courses count as work activity and~~
17 ~~receive cash grants to purchase appropriate education materials.~~

18 ~~(11) A process allowing for the establishment of good cause~~
19 ~~before a sanction is imposed and the provision of a reasonable~~
20 ~~time for the good cause process to occur.~~

21 ~~(12) Be informed at the time of a sanction what the~~
22 ~~requirements are for continuing cash assistance, Medicaid, and~~
23 ~~food stamps and to appeal a sanction.~~

24 ~~(13) A fair hearing, provided upon request, to be held within~~
25 ~~10 days of the request or to be notified by mail with five days'~~
26 ~~notice or to have the hearing scheduled at the time of the request.~~

27 ~~(14) Have a third party present at a fair hearing with the~~
28 ~~county welfare department, have a third party accompany them~~
29 ~~to meetings and appointments and receive a list of advocacy~~
30 ~~organizations in the community.~~

31 ~~(15) View all information in the recipient's personal case file~~
32 ~~located at any office of the county welfare department and to~~
33 ~~correct information that has been recorded incorrectly by filing a~~
34 ~~statement with the correct information.~~

35 ~~(16) Timely correction of any error made in the calculation of~~
36 ~~benefits and any financial restitution which may be required.~~

37 ~~SEC. 2. If the Commission on State Mandates determines that~~
38 ~~this act contains costs mandated by the state, reimbursement to~~
39 ~~local agencies and school districts for those costs shall be made~~

- 1 pursuant to Part 7 (commencing with Section 17500) of Division
- 2 4 of Title 2 of the Government Code.

O